

Exhibit 3B-1

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**WITNESSES FOR DEFENDANTS EIDP, INC. F/K/A E.I. DU PONT DE NEMOURS &
CO. (EIDP) AND THE CHEMOURS CO.**

Brad Campbell (Adverse)

The Department's oversight at Chambers Works from 2002-2006, including permitting, remedial activities; No Further Action letters and agreements and covenants not to sue issued by NJDEP; negotiations during the drafting of the CRACO; post-execution implementation of the CRACO; communications between NJDEP and EIDP regarding the remediation at the Chambers Works facility; communications between NJDEP and EIDP regarding PFAS.

Frank Faranca (Adverse)

Historical presence of PFAS and other COCs at the Chambers Works facility; remediation at the Chambers Works facility; regulatory compliance at the Chambers Works facility; communications between NJDEP and EIDP regarding the remediation at the Chambers Works facility; contemporaneous knowledge of the presence of PFAS at Chambers Works at the time of the CRACO.

Pamela Lange (Adverse)

Negotiations and implementation of CRACO; PFAS as a COC at Chambers Works; NJDEP's groundwater formula proscribed by their NRD policy of 2003-07.

Gloria Post (Adverse)

NJDEP knowledge of the emerging science relating to PFAS dating back to the 1990s prior to execution of the CRACO and communications between NJDEP, Chemours and EIDP relating to same.

Bernard Reilly

Negotiations of the CRACO.

John Sacco (Adverse)

NJDEP's establishment of the state program relating to the CRACO; negotiations during the drafting of the CRACO; post-execution implementation of the CRACO; NJDEP's communications regarding performance of the CRACO.

Ralph Stahl

Negotiations with NJDEP during the drafting of the CRACO; post-execution implementation of the CRACO.

PLAINTIFFS' OBJECTIONS TO EIDP AND CHEMOURS WITNESSES

General Objection

Plaintiffs object to all testimony from any of Defendants' witnesses listed above regarding settlement negotiations between the Department and EIDP prior to the signing of the CRACO on June 30, 2005, including the use of parol evidence.

Frank Faranca and Dr. Gloria Post

Plaintiffs object to the testimony of Frank Faranca and Dr. Gloria post as not relevant. Neither Mr. Faranca nor Dr. Post has relevant knowledge regarding the CRACO itself, or the negotiations leading thereto. To the extent these witnesses are permitted to testify, Plaintiffs also object, as irrelevant, to any questioning regarding the Department's understanding of and regulatory planning for PFAS at any point after the CRACO was signed on June 30, 2005.

Ralph Stahl

Plaintiffs object to the testimony of Mr. Stahl regarding post-execution implementation of the CRACO to the extent that Mr. Stahl does not have personal knowledge of such matters.

Pamela Lange

Plaintiffs object to the identification of Pamela Lange based on late disclosure.